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April 15, 2015

Mr. J. Carton Parker  
Nevada Division of Environmental Protection (NDEP)  
Bureau of Corrective Actions (BCA)  
2030 E. Flamingo Road, Suite 230  
Las Vegas, NV 89119

**RE: First Quarter 2015 Quarterly Progress Report  
Former Stauffer Chemical Company Facility  
NDEP Facility ID #H-000536 Pioneer/Stauffer  
Henderson, NV**

Dear Mr. Parker:

This Quarterly Progress Report (QPR), prepared on behalf of Stauffer Management Company LLC (SMC) and Pioneer Americas LLC [dba] Olin Chlor Alkali Products (Olin), summarizes notable activities performed during the First Quarter of 2015, as part of the Phase II Environmental Conditions Investigation (ECI), at the former Stauffer Chemical Company facility (Site) in Henderson, Nevada. This QPR is submitted to the NDEP in accordance with the June 28, 1996 Phase II Consent Agreement entered into by the NDEP, Pioneer Chlor Alkali Company, Inc. and SMC. Notable activities performed during the reporting period included:

- On January 6, 2015, Clark County Department of Air Quality (DAQ) approved the *Initial Air Quality Regulations (AQR) 12.1 Minor Source Permit Application* for the Site Groundwater Treatment System (GWTS).
- On behalf of Olin and SMC, the *Fourth Quarter 2014 QPR* was submitted to the NDEP on January 15, 2015.
- On January 27, 2015, a letter requesting the *Optimization of Monitoring and Reporting Frequency* for the GWTS was submitted to NDEP on behalf of Olin, SMC/Syngenta Crop Protection, LLC (Syngenta), and Montrose Chemical Corporation of California (Montrose), collectively referred to as the "Companies". NDEP approved the request on February 18, 2015.
- In a letter dated January 29, 2015, NDEP provided comments on the Companies' previous submittal *DVSR No. 46, Site Wide Groundwater Monitoring Program, Annual 2014*. On behalf of the Companies, a *Response to Comments on DVSR 46* was submitted to NDEP on March 2, 2015.
- On behalf of SMC/Syngenta Crop Protection, LLC (Syngenta), the *Conceptual Site Model, Leach Beds (LOU No. 9) and Phosphoric Acid Pond and Three Trenches (LOU No. 4)* was submitted to the NDEP on February 3, 2015.
- On behalf of the Companies, a *Comments on Draft Initial AQR 12.1 Minor Source Permit* was submitted to DAQ on February 5, 2015.

- On behalf of the Companies, on February 12, 2015, a *Response to Comments on Eastside Workshop Follow-up Reports, Shallow Zone Water Level and Particle Tracking Project, and Verification Groundwater Sampling Event Boulder Highway Transect*, was submitted to NDEP.
- On behalf of the Companies, the *Semi-annual Underground Injection Control Report* and the *Fourth Quarter 2014 Quarterly Operations Report* for the GWTS was submitted to NDEP on February 16, 2015.
- On February 18, 2015, the Companies met with NDEP to discuss and resolve NDEP's comments, dated December 10, 2014, on the Draft Site Groundwater Remedial Alternate Study.
- In a letter dated February 27, 2015, NDEP provided comments on SMC/Syngenta's previous submittal *Conceptual Site Model, ACD Drum Burial Waste Management Area, LOU No. 5*.
- On behalf of the Companies, the *Annual Summary of Activities* for the GWTS' air stripper was submitted to the DAQ on March 24, 2015.

Should you have any questions related to the information contained herein, please contact me at (423) 336-4540, via email at dmshare@olin.com, or an alternate Company representative.

Sincerely,



David M. Share  
Director, Environmental Remediation

Enclosures:  
Former Stauffer Chemical Company Facility Fact Sheet  
Selected Site Assessment Areas Status Update

cc: James (JD) Dotchin, Supervisor, BCA, NDEP, Las Vegas  
BMI Compliance Coordinator – NDEP Las Vegas, NV (paper & electronic)  
NDEP c/o Broadbent & Associates – (paper & electronic [2])  
Jeff Gibson – American Pacific Corporation  
Mark Paris – Basic Remediation Company  
Lee Farris – Basic Remediation Company  
Ranjit Sahu – Basic Remediation Company  
Joe Kelly – Montrose Chemical Corporation of California  
Paul Sundberg – Montrose Chemical Corporation of California  
Jay Steinberg – Nevada Environmental Response Trust  
Allan DeLorme – Environ  
John Pekala – Environ  
Curt Richards – Olin Corporation  
David Share – Olin Corporation  
Chinny Esakkiperumal – Olin Corporation  
Ed Modiano – de maximis, inc.  
Charles Elmendorf – Stauffer Management Company LLC  
Bill Carson – Terraphase Engineering, Inc.  
George Crouse – Syngenta Crop Protection, LLC  
Nicholas Pogoncheff – PES Environmental, Inc.  
Dick Pfarrer – TIMET  
Enoe Marcum – WAPA